

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268

In the Matter of:

Fairfield, KY 40020

Docket No: A 2012-23

William T. (Tom) Trent, Petitioner

PARTICIPANT STATEMENT

1. Petitioner is appealing the Postal Service's Final Determination concerning the Fairfield post office. The Final Determination was posted September 16, 2011.
2. In accordance with applicable law, 39 U.S.C. 404(d)(5), the Petitioner requests the Postal Regulatory Commission to review the Postal Service's determination on the basis of the record before the Postal Service in the making of the determination.
3. Petitioner respectfully requests the Commission's understanding and indulgence in that he is not an attorney and does not know the format and wording that the Commission may expect.
4. Below are the reasons why the Postal Service's Final Determination should be reversed and returned to the Postal Service for further consideration.

A. Include all points raised in the initial appeal as part of this participant statement.

- B. There is no public transportation available.
- C. The Postal Service continues to proceed with this closing without answering the Fairfield postal customers' concerns:
  - a. Where will the CBU boxes be located?
  - b. Who will maintain and clear the access to and around the boxes?
  - c. What time of the day will the mail arrive?
  - d. Are parcel lockers being provided?
  - e. Is an outgoing mail receptacle being provided?
- D. Postal responses to Community Postal Needs in the Final Determination were answered with rural carrier delivery solutions as if Fairfield customers were erecting curb-side mailboxes. No mention has been made of rural carriers taking CBU mail to customers' homes. Therefore, why give rural delivery answers. See Item No. 47; Page Nos. 2, 3, 4, 6, and 7; Concern Nos. 1, 2, 3, 4, 5, 8, 9, 10, 11, 13, 14, 15, 29, and 36.
- E. Postal response to Concern No. 7, Item No. 47, Page No. 3, says, "Customers will be assigned a 911 address...." Fairfield residents and all Nelson County, KY postal customers already have 911 addresses. The Postal Service does not know our community and has made no effort to know it.
- F. Postal response to Concern No. 24, Item No. 47, Page No. 6, says, "The Postal Service has and will provide required maintenance on the facility as long as it is postal owned." The Fairfield Post Office building, which is owned by the USPS, as well as,

the land it sits on, has been in need of roof repair for numerous years and has never been adequately maintained. Thus, there is water damage and mold.

The Fairfield Post Office was broken into on October 21, 2011 by breaking out a side-wall window. The USPS boarded up the window, greatly reducing the amount of natural light and ventilation in the building. To date the Postal Service has not replaced the broken window; thus, not maintaining their Postal-owned building and showing a total disrespect and disregard for the employees and customers of the Fairfield Post Office. Also, the outside sign for the Post Office has been in need of repair or replacement for several years. See Attachment A, Photos, Pages 6 and 7.

It appears the Postal Service has been planning for many years to close the Fairfield Post Office and has not adequately maintained it.

- G. Postal response to Concern No. 26, Item No. 47, Page No. 6, says, "Mail deposited in the collection box will be picked up at 4 p.m. daily." This answer is what is happening today with the Fairfield Post Office still in operation. Is the Postal Service promising a collection box and 4 o'clock pick up at the CBU boxes if the Fairfield Post Office is closed?
- H. Concern No. 27, Item No. 47, Page No. 6, addresses the proposed closing due to declining workload. The Postal Service brought on this declining workload by reducing hours of operation and locking the lobby.
- I. Under "Effect on Community", Item No. 47, Page No. 8, Concern No. 5, the Postal Service's response says, "....since the suspension of service, there has been no indication that the business community has been adversely affected...." There has

been **no suspension of service** at the Fairfield Post Office—regular postal hours continue with full retail services. Again, the Postal Service does not know what it is doing in our community.

- J. Under “Economic Savings”, Item No. 47, Page No. 9, the Postal Service illustrates its Postal cost by using a Postmaster’s salary and fringe benefits totaling \$44,279. Fairfield Post Office has not had a postmaster since November 1, 2009 and can be operated cheaper, and just as effectively, using the current OIC and a PMR. The cost of the OIC and PMR is the dollar number that should be used in the comparison.

The \$4,836 cost of replacement service is taken from the Postal Service’s Official Record, Item No. 17, Page No. 1, Rural Route Cost Analysis Form. This form shows the cost of adding 93 rural route boxes to a rural carrier’s route, without adding miles, and no cost allowance made for mail volume (types and pieces of mail handled).

The Postal Service has taken the position that service will be provided to Fairfield postal customers at CBU boxes, not rural route curb-side boxes. If the Postal Service is going to convert the Fairfield Post Office box customers to rural delivery, mileage would be added to rural routes at the Bloomfield, Cox’s Creek, and Taylorsville Post Offices, in addition to, box factors and mail volume. This \$4,836 number is inaccurate and cannot be used for this comparison.

Therefore, the Postal Service has failed to accurately show what the economic savings would be in closing the Fairfield Post Office.

K. Under "Other factors", Item No. 47, Page No. 9, the Postal Service says, "Centralized Box Unit (CBU) service will only be established if the Postal Service is unable to lease space in the present location...." In the very first paragraph on Page No. 2 of Item No. 47 and in the first paragraph on Page No. 10 of Item No. 47, there reads, "...Service will be provided to cluster box units (CBUs)." What is the Postal Service's plan? Fairfield does not know and, apparently, nor does the Postal Service.

### **Summary**

The Postal Service does not know the facts about the Fairfield Post Office and community; has not expressed and laid out an exact plan for its Fairfield Postal customers; has not maintained its Postal-owned building and property; and is not using accurate facts, numbers and comparisons to determine factual cost savings and community needs.

Dated: Fairfield, Kentucky  
November 21, 2011

Respectfully submitted,

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## ATTACHMENT A: PHOTOS



Inside of Fairfield Post Office where window was broken out.



Outside of Fairfield Post Office where window was broken out.

## ATTACHMENT A: PHOTOS (Continued)



Outside sign for the Fairfield Post Office. Note the duct tape at the top and how it is broken loose from the nails at the bottom.